

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

Western District of Virginia

Division

CLERK'S OFFICE U.S. DIST. COURT
AT LYNCHBURG, VA
FILED

NOV 18 2019

JULIA C. DUDLEY, CLERK
BY: [Signature]
DEPUTY CLERKCurtis-Craig Littlejohn

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. 6:19 CV 00082

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☒ NoLynchburg Department of TaxationJames Elliot Tax Lawyer

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Curtis-Craig Littlejohn</u>
Street Address	<u>3 High Street Apt 2</u>
City and County	<u>Roughkepsie Dutchess</u>
State and Zip Code	<u>New York 12601</u>
Telephone Number	<u>(845) 293-9984</u>
E-mail Address	<u>Curtis.Littlejohn33@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name

James Elliot

Job or Title (if known)

~~Tax~~ Lawyer

Street Address

7100 George Washington Memorial Highway

City and County

Yorktown

State and Zip Code

Virginia 23690

Telephone Number

(757) 898-7000

E-mail Address (if known)

Defendant No. 2

Name

Lynchburg Department of Taxation

Job or Title (if known)

Street Address

900 Church Street

City and County

Lynchburg Campbell

State and Zip Code

Virginia 24501

Telephone Number

(434) 455 4212

E-mail Address (if known)

Defendant No. 3

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Defendant No. 4

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

- ⑨ Schedule "A"
- ① Bill of rights Number 5 Treaty of peace 1783
 - ② Bill of rights Number 7 Declaration of independence 1776
 - ③ Bill of rights Number 10 Articles of confederation 1778
 - ④ International UCC Financing Statement Administered by Secured Party Title 46 USC 31343 and Article 1 and 5 of International Convention on Maritime Liens
 - ⑤ Non Negotiable Private Security Agreement with IRS Trust Number and papers from IRS

B. If the Basis for Jurisdiction Is Diversity of Citizenship

- ⑩ Disregarding international commercial lien for \$100,000 for personal gain violating Bill of Rights

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Curtis-Craig Littlejohn, is a citizen of the State of (name) New York Republic.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) LYNCHBURG TAX DEPARTMENT, is incorporated under the laws of the State of (name) VIRGINIA, and has its principal place of business in the State of (name) VIRGINIA.
Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy \$100,000 and liens that is superior with UCC paper work and security agreement.
The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

\$100,000 paid \$64,000. For House in 2009

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

IV. Relief

Did not give plaintiff opportunity to make reasonable installment payment and not sending notice to New York State house was being foreclosed on. Stop for closure to make reasonable payments

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Restraint order to ask the court to stop the foreclosure to make reasonable installment payments instead of full price that can be paid plaintiff has a job and can make installment payments

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

11/3/2019

Signature of Plaintiff

Printed Name of Plaintiff

Curtis - Craig Littlejohn
Curtis - Craig Littlejohn

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address